

# Response to Request for a Written Brief from IFAW on Canada's seal populations and their effect on Canada's fisheries.

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## About IFAW

The [International Fund for Animal Welfare](#) (IFAW) is a global non-profit helping animals and people thrive together. Founded in 1969 in New Brunswick, Canada, today we work in more than 40 countries around the world. We rescue, rehabilitate, and release animals, and we restore and protect their natural habitats. We partner with local communities, governments, non-governmental organizations, and businesses to pioneer new and innovative ways to help all species flourish.

At IFAW we believe every individual animal matters, and we create impact by operating at the nexus of animal welfare and conservation, where the individual is the first critical component and a fundamental piece of the global puzzle. A healthy planet needs a healthy ocean. Yet today, our world's marine life and marine habitats face ever-increasing threats from human activities such as shipping, unsustainable fishing, industrial development and pollution.

## On Canada's commercial seal hunt

IFAW's history with Canada's east coast commercial seal hunt [spans over 54 years](#) and includes support for [veterinary studies](#), legal reviews, socioeconomic analyses, [ethical analyses](#), public opinion surveys, on-ice documentation, a [precautionary management approach](#), [evaluation of management objectives](#), [estimates of total kill](#), the impact of the [trade in seal parts on endangered species](#), and scientific modelling the [impacts of climate change](#). We have also provided support for economic alternatives to commercial sealing in Atlantic Canada, such as funding for seal ecotourism initiatives and, more recently, [ghost gear removal](#) in Newfoundland.

IFAW is not opposed to the current "personal use" hunting of seals in Atlantic Canada, nor the hunting of seals by Indigenous Peoples, for whom sealing is a source of food and economic income, a cultural practice and a legal right.

Our concern has been, and continues to be, the large-scale, politically driven, commercial exploitation of seals on the East Coast of Canada for the global wildlife trade. Historically, this hunt focused on the blubber, and later the fur, of newborn harp and hooded seal pups. With the advent of electricity eliminating the need for seal and whale oil as a source of fuel, and the end of commercial hunting of whitecoats for their fur in 1987, the target of the sealing industry is now immature harp pups aged between 3 weeks and 3 months of age.

The current seal hunt, as it has existed since 1995, is a politically driven activity initiated by the Honourable Brian Tobin during his tenure as Minister of Fisheries and Oceans in the wake of the Atlantic cod collapse. It was John Crosbie as Minister who accurately stated he “didn’t take the fish from the goddamn water”, but it was his successor, Brian Tobin, who dishonestly blamed harp seals.

Since that time, the Government of Canada has been working diligently to expand the commercial seal hunt. By [increasing the Allowable Catch, and introducing a per pound subsidy for meat](#), Tobin sought to increase the number of seals killed. And at first, he succeeded. With the help of \$20 million [in federal and provincial subsidies](#), the landed catch of seals jumped from 60,000 in 1995 to 242,000 in 1996. After 10 years, and hundreds of millions of dollars in support, the east coast sealing industry [peaked in 2006](#) with an average landed value of \$109 per skin.

Since 2006, the industry has been in steep decline. Some like to blame “[animal NGOs](#)” for the demise of the sealing industry, and often groups like IFAW are more than happy to take the credit. But the truth is, many factors beyond the EU ban were involved in the failure of the sealing industry to thrive. [Economic turmoil in Russia and China](#), [warming winters](#), a global fur market [flooded with cheap Chinese mink](#), seal processors overpaying for poor quality pelts and dumping them into the market, and a [declining public acceptance](#) of fur in general meant that seal fur – a marginal product within the niche fur industry – suffered. In the years that followed, seal processors were essentially being funded by government to purchase pelts that were [stockpiled](#) or [dumped](#). The declining public appetite for fur has continued, with large mainstream Canadian brands such as [Canada Goose](#) and [Pajar](#) recently announcing their decision to go “fur-free”.

In 2009, the EU implemented the [Trade in Seal Products Regulation](#). Canada [lost its costly, multi-year challenge and Appeal of the Regulation](#) at the World Trade Organization. There are now 36 international bans on seal products. China was hyped as [the seal hunt’s “last hope”](#), but [“aggressive” efforts to market seal meat in China](#) were denounced as [offensive](#) and [racist](#). A premature announcement that Canada had [secured a trade deal](#) for seal meat turned out to be yet another [empty promise](#).

Seal meat has always been a tough sell, despite major efforts to market seal meat in Canada since the 1990s. Despite support from [famous chefs](#) and events in [high-end urban restaurants](#), seal remains very much a novelty food in most of Canada, and the most promising uses appear to be for [pet treats](#), or [lobster bait](#). The Canadian government and sealing industry has spent over 25 years trying to find viable markets for seal products, and has considered proposals or attempted to market seal products such as: [protein powders](#) for diet and weight loss consumers and for hunger relief in Africa, [heart valves](#) for human transplant, [welding aprons](#), weather shields, biodiesel, paint, and [seal penis energy drinks](#).

## On marine mammal culls

With the failure of markets for seal products to materialize, calls to cull seals from fish harvesters become louder, and pressure on policy makers to “do something” increases. Yet, almost three decades of scientific research seeking to find a negative impact of seals on fish stocks has come up empty handed, concluding that culling harp seals is [unlikely to benefit ground fish stock](#). Any proposals for culling seals – whether by increasing the TAC, by a government-supported cull, or other means – should be evaluated in a manner outlined by the [United Nations Environment Programme’s Protocol for the](#)

[Scientific Assessment of Proposals to Cull Marine Mammals](#). Without such assessment, the risk of a seal cull proving detrimental to fishing interests is high.

Despite a complete lack of scientific support for a seal cull, Canada has conducted feasibility studies, analysed the costs, logistics, and expected outcomes, and rightly rejected proposals for [Seal Exclusion Zones](#), seal [birth control](#), the re-introduction of an incentive-based targeted removal program (bounty), and the [shooting and incinerating of 220,000 seals on the beaches of Sable Island](#).

These studies have determined that a culls are logistically challenging, extremely expensive, long-term undertakings that are [unlikely to achieve their objectives](#). To have a marginal impact on consumption, an enormous number of seals would need to be killed. Veterinarians note that killing large numbers of seals humanely is very difficult or [impossible](#). These seals will need to be adults, not the immature seals currently targeted. Adult seals take longer to handle, process, and store, and full utilization will be a challenge as their pelts have very low market viability.

Public response and international pressure will also be a factor. If Canada needs to kill seals in order to conserve a fish stock, any fishery of that stock cannot be considered sustainable and Canadian seafood products may lose sustainability certifications or be subject to [trade embargos](#). Public acceptance of a cull within Canada, in the absence of scientific support, is also likely to be low.

## On political support for the seal hunt

The political enthusiasm in Ottawa for killing seals, on the other hand, is extraordinary and unwavering, matched only by those who fervently believe that **this** is year the [Toronto Maple Leafs](#) will win the Stanley Cup. It certainly exceeds that observed within Newfoundland, where many folks publicly support a seal hunt, but privately question its future. Then again, Newfoundlanders are known to be [sensible and pragmatic](#) bunch, and are also acutely aware of the [dangers](#) and costs involved.

In addition to the current studies on pinnipeds being conducted by both the House and Senate, and the 2012 report from [this Committee](#) on grey seals, the Standing House Committee on Fisheries has produced Seal Reports in 1999, 2005, 2007, 2009, again in 2009, 2012, 2014, and 2017. There is also a three-volume Report from the [Royal Commission on Seals and Sealing](#) (1984), and a Report from the [Eminent Panel on Seal Management](#) (2001). We appointed a [Seal Ambassador](#) in 2008, and in 2017 we designated [National Seal Products Day](#). We have been subject to photo ops of our leaders [noshing on seal meat canapes](#) and wearing borrowed [seal fur](#) to [“prove” their support](#) for the industry.

This is all fine and dandy, if not exactly a big vote-getter. But as government sits, contemplating - for not the first time – whether seal protein powder might be the solution to world hunger, [climate change and overfishing are depleting fish stocks](#). [Warming water temperatures](#) are causing unparalleled cascading effects including ice melt, sea level rise, increased deoxygenation, marine heat waves, ocean acidification, with impacts on all marine species, from the blooming of phytoplankton to the health and migratory patterns of great whales. [Worsening weather systems are directly threatening fish harvesters](#) and their livelihoods. Species such as the [Critically Endangered North Atlantic Right Whale](#) teeter on the brink of extinction. Federal programs to reduce marine plastic waste and ghost gear – areas where Canada is recognized as showing real [international leadership](#) – are under threat. These are real and urgent problems facing marine ecosystems that need to be addressed, and arguably more important priorities than discussing how to expand Canada’s 30-year-long efforts to promote seal products.

## On nature-based solutions to climate change and oceanic blue carbon

Marine mammals like seals and whales are widely accepted to be [victims of the climate crisis](#), but they are also solutions. Protection of ocean life is critically important in the fight against climate change. Marine ecosystems are estimated to absorb 25% of the CO<sub>2</sub> in our atmosphere. Marine mammals such as seals and whales help [remove carbon from the atmosphere](#) by locking it in their bodies. Seals also play an important ecological role in distributing nutrients across latitudes, throughout the water column, and from sea to shore. Protecting marine biodiversity, systems, and processes will be critical to mitigating the impacts of a heating climate.

## The way forward

There is nothing “new” about trying to exploit seals as a resource, or sending seal meat to Africa. What would be new, and worthy of discussion in the Senate, would be to:

- Acknowledge the important role that sealing plays in the culture and history of Newfoundland, and Maritime Quebec, while accepting that this is not an economically viable, necessary, or future-proof industry in which to invest taxpayer dollars.
- Acknowledge and support the importance of sealing as a source of food, culture, and economic livelihood for Inuit, while resisting the urge to [conflate it with the East coast commercial seal hunt](#).
- Acknowledge the important ecological role that [marine vertebrates play in tackling climate change](#), and stop viewing seals, whales, sharks, and seabirds simply as predators or competitors for fish. Healthy populations of large marine animals, particularly whales, seals, and sharks, play a key role in regulating ocean ecosystems and keeping carbon locked in the ocean.
- Redirect the time, energy, and taxpayer dollars spent trying to find ways to market seal products, and instead focus on building strong, resilient fisheries and adaptive capacity of marine communities.